Engineering for a Better World
FEEZOR
ENGINEERING, INC.

February 9, 2016

Mr. Tom Mahler
On-Scene Coordinator – Missouri / Kansas Remedial Branch Superfund Division
United States Environmental Protection Agency – Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Response to Comments to the Draft Work Plan for Installation of a Non-Combustible Cover for West Lake Landfill Operable Unit - I

Mr. Mahler:

On January 29th, 2016, the United States Environmental Protection Agency (USEPA) issued comments to the above-referenced work plan (hereinafter referred to as the "Draft Work Plan"). The USEPA conditionally approved the start of field work according to the schedule in the Draft Work Plan, provided four specific review comments were addressed prior to the start date. These comments included specific review comment 2, specific review comment 7, specific review comment 8, and specific review comment 9. This correspondence addresses these four specific comments. A revised Work Plan that addresses the remaining comments will be submitted within 14 calendar days of receipt of the January 29, 2016 letter.

> *Specific Comment 2: The NCC work plan should include actions to address all areas potentially impacted by RIM at or near the surface on the Buffer Zone/Crossroad Property and any contiguous properties. These actions should be consistent with those planned for the Area 1 and Area 2 disposal cells. Please include a separate schedule for these areas.*

Response:

The entire Buffer Zone is currently owned by Rock Road Industries, Inc. and is therefore currently accessible to the Respondents for purposes of performing the required work. The Buffer Zone will be scanned via overland gamma scan according to the procedures specified in the Work Plan and associated planning documents (e.g., Sampling and

406 East Walnut Street • Chatham, IL 62629
Phone (217) 483-3118 • Fax (217) 483-2356

Analysis Plan). The overland gamma survey will be performed using Ludlum 44-10 (2x2) Sodium Iodide (NaI) detectors coupled to Ludlum 2221 survey meters modified to integrate and transfer data from the detector at a rate of once per second to a Trimble GeoPositioning System (GPS) which stores the gamma reading and the location of that reading. If the scanning procedures indicate the potential for RIM, the affected areas will be cleared of vegetation followed by placement of a geotextile fabric and a nominal 8-inches of road base material. After clearing has occurred 10 feet beyond the extent of surface RIM identified in the Work Plan, or as further defined by the results of the overland gamma survey to be conducted along the along the perimeter of the outer boundary of the extent of surface RIM/outer edge of the NCC, confirmation samples will be collected at approximately 100 feet spacing along the perimeter except for those areas where the outer edge of the surface RIM/NCC coincides with the edges of the Area 1 or Area 2 waste disposal unit boundaries (e.g., along the north side of Area 1 adjacent to the landfill access road). More frequent biased samples will be obtained from any potential erosional depositional areas that may be identified during the vegetation clearing, overland gamma survey or NCC installation activities.

Crossroads Lot 2A2, which is located adjacent to the Buffer Zone, is not owned or controlled by Respondents, but is owned by others, and therefore is not accessible to the Respondents at this time. The OU-1 Respondents' Project Coordinator will contact the current owner of Crossroads Lot 2A2 to obtain permission to conduct additional characterization via overland gamma scanning and confirmation testing along the northern perimeter of Lot 2A2 that does not currently have rock/asphalt cover. The same procedures (overland gamma scanning and confirmation sampling) will be used as described in the Work Plan. The results of the characterization will be provided to the USEPA.

A specific schedule has not been established for the additional characterization of the Buffer Zone or portions of Crossroads Lot 2A2. It is expected that it should only take a few hours to one day to scan the Buffer Zone, and only about an hour or two to scan the uncovered portion of Lot 2A2 (provided we receive permission to do so). This work will be done once the contractor clears the vegetation from the Buffer Zone, which will occur after the contractor clears the vegetation leading to the edge of the top of Area 2 and from the slope of the landfill berm above the Buffer Zone and builds a ramp from the top of the slope down to the Buffer Zone. A specific schedule has not been established for these clearing and ramp-building activities.

Specific Comment 7: Section 2. 2, page 6: This section needs to include more details regarding the physical placement of the NCC including planned or potential use of staging areas or stock piles for materials/debris.

Response:

The vegetation will be cleared with a forestry mower attached to a low ground pressure tractor such as a skid steer. The vegetation will be moistened as necessary to minimize visible dust prior to the forestry mower advancing. Rutting will be minimized by the equipment selection. Metal items or other debris on the surface of the existing landfill will be moved to an area or areas within Area 1 or 2 outside of the extent of where surface RIM exists. The debris will be stockpiled on the existing asphalt pavement in Area 1 and/or on the existing inert fill in Area 2, or otherwise placed on an area(s) outside the extent of surface RIM and non-combustible cover.

Rock stockpiles may be used for temporary storage of rock prior to placement within the NCC cover area, but it is generally expected the rock material will be delivered to the NCC cover area via tandem on-road haul trucks, and the trucks will only drive on previously rocked areas and deposit the rock onto the advancing front of the cleared areas. The geotextile and rock placement will occur in such a manner that all newly cleared areas will be covered generally within 24 hours, but not more than 48 hours after clearing.

Specific Comment 8: Section 2.2, page 6: Please provide details identifying the source of any rock materials used as part of the NCC and how that will be documented.

Response:

Section 2.2 will be modified to explain that the rock will be provided by the Fred Weber Quarry. Load tickets from the quarry will be collected to ensure the rock was from this quarry.

Specific Comment 9: Please clarify what BMPs will be used to address the potential for contaminants or other debris to mobilize after vegetation is cut.

Response:

Section 2.3 will be modified to include a discussion pertaining to the BMPs. It is anticipated that placement of the geotextile and rock cover material will generally occur the same day as the vegetation removal activities, but in any event should be completed within 48 hours of the vegetation clearing in any particular area. Should heavy rain be forecasted and an area cannot be covered the same day, storm water waddles will be placed on any downslope areas. In addition, vegetation clearing will

not be performed during periods when severe thunderstorms or major precipitation events (rainfall of a rate of over ½ inch per hour) are forecasted for the site area or when observations by on-site personnel indicate a potential for a severe thunderstorm or major precipitation event. Additionally, on days when precipitation is anticipated to occur, placement of geotextile and rock cover will be coordinated to closely follow the vegetation clearing activities and the vegetation clearing will be closely monitored and/or suspended as necessary to ensure that the geotextile and sufficient cover necessary to anchor the geotextile can be placed prior to the occurrence of thunderstorms.

If you have any questions or comments, please contact me at your convenience.

Sincerely,

Daniel R. Feezor, P.E.
NCC Cover Field Project Manager